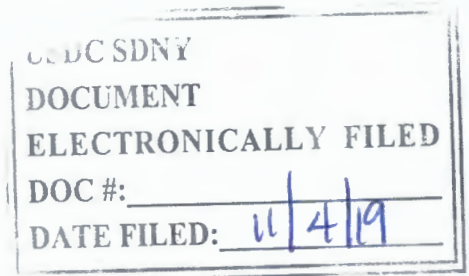




Attorneys at Law  
32-72 Steinway Street, Suite 402  
Astoria, New York 11103



Frank A. Ortiz (1931-2016)  
Norma E. Ortiz\*

Tel. (718) 522-1117  
Fax (718) 596-1302  
email@ortizandortiz.com

Maria Perez Brown\*  
\* (Admitted in New York and New Jersey)

*November 1, 2019*  
~~February 8, 2019~~

*eica*  
Hon. Naomi R. Buchwald  
500 Pearl Street  
New York, New York 10007

ENDORSEMENT  
*One final adjournment of thirty days is granted.*  
*Naomi R. Buchwald, USDC*  
Re: Noble v. Mount Olivet Church  
Civil Case No. 18-cv-07871 *11/4/19*

Status Report

Dear Judge Buchwald:

Your Honor ordered the completion of discovery by October 29<sup>th</sup>. My office incorrectly calendered the deadline as November 1<sup>st</sup>. I apologize for my late report.

The Defendant has agreed to produce one more person for a deposition. If Your Honor permits another extension of our time, we intend to conduct that deposition before the end of November. In addition, the parties have requested cell phone records that we have not yet obtained and have not received.

Once that deposition is completed, and we have exchanged the remaining documents, we believe we will file a pre-motion letter for permission to move for summary judgment.

I have conferred with counsel before making this request for a final extension. I do not believe we will require any further extensions for discovery.

Thank you for your time and consideration.

Very truly yours,

S/Norma E. Ortiz

cc: David Broderick, Esq.